IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)
)
v.) Criminal No. 1:09:CR0430
)
LOURDES ROJAS ALMANZA,) Honorable Gerald Bruce Lee
)
) Sentencing: April 30, 2010
Defendant)
)

MOTION OF THE UNITED STATES FOR AN ADDITIONAL ONE LEVEL REDUCTION IF THE COURT FINDS THAT THE DEFENDANT QUALIFIES FOR ACCEPTANCE OF RESPONSIBILITY

The United States of America, through its attorneys, Neil H. MacBride, United States Attorney and Charles F. Connolly and Marla B. Tusk, Assistant United States Attorneys, moves this Court pursuant to U.S.S.G. § 3E1.1(b) to grant an additional one-level reduction in the offense level for acceptance of responsibility, *if* the Court finds that the Defendant qualifies for acceptance of responsibility under U.S.S.G. § 3E1.1(a).

The government states that the defendant has assisted authorities in the investigation and prosecution of her misconduct by timely notifying the United States of the defendant's intention to enter a plea of guilty, thereby permitting the United States to avoid preparing for her trial and permitting the United States and the Court to allocate their resources efficiently and to prepare for the trial of her co-defendants.

Respectfully submitted,

Neil H. MacBride United States Attorney

By: /s/

Charles F. Connolly
Assistant United States Attorney
U.S. Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Ph: 703.299.3771

Fax: 703.299.3981

Charles.Connolly@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of April 2010, I filed electronically the foregoing motion using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Jonathan A. Simms
Rich Rosenthal Brincefield Manitta Dzubin & Kroeger, LLP
201 N. Union Street, Suite 140
Alexandria, VA 22314
703.299.3440
702.299.3441

JASimms@RRBMDK.com
Counsel for Defendant Lourdes Rojas Almanza

Nina Blanchard Senior U.S. Probation Officer Suite 100 10500 Battleview Parkway Manassas, VA 20109

Tel: (703) 366-2100 Fax: (703) 366-2350

Nina_Blanchard@vaep.uscourts.gov

/c/

Charles F. Connolly
Assistant United States Attorney
U.S. Attorney's Office
2100 Jamieson Avenue
Alexandria, VA 22314
Ph. 703 200 3771

Ph: 703.299.3771 Fax: 703.299.3981

Charles.Connolly@usdoj.gov